

Comment Info: =====

General Comment:Gentlemen;

Fluor is a significant exporter under the Export Administration Regulations. In order to consistently manage export activity in our diverse products and locations

we have invested in and implemented a database system to prepare and submit export license applications and comply with export authorizations. We applaud the

improvements in the submission process incorporated in SNAP-R, but we find it is seriously incomplete without an automated interface for direct submission from a database application. Therefore the proposed rule to mandate SNAP-R as the only means to submit applications is seriously misguided.

SNAP-R requires the user to enter data into an Internet browser interface and attach supporting files, all information transposed from other enterprise applications and reports. This is a separate manual process entirely disconnected

from our enterprise application and database. To enforce strict compliance with EAR, our internal procedures require each application to go through certain workflow with programmatic checks at critical gate points. It is a serious compliance risk to require our users to leave the corporate compliance system in order to copy the same data into the SNAP-R web site.

The proposed rule includes extensive discussion of the impact on small business and those submitting only a handful of applications per year. Those exporters may

represent the largest volume of applications, but the largest value of exports is

certainly concentrated in those of us who submit dozens of applications from multiple locations, and SNAP-R as yet ill serves our needs.

Our objective is to capture all of our export information, both licensed and unlicensed, for management visibility, analysis and audit of best practices throughout the corporation. In the case of our ITAR exports, D-Trade facilitates internal compliance with a direct program interface. SNAP-R imposes a significant

inefficiency and risk by not having a similar direct programmatic interface to submit license applications. It is time not to terminate ELAIN but to replace it with

a program interface that incorporates the SNAP-R data formats and document attachment capabilities.

We urge you to sponsor and develop a direct program interface for SNAP-R application submissions as soon as possible, and to postpone the SNAP-R mandate until it is available. We are certain this will be to the benefit of both industry and your department.

Sincerely,

Jeff Nolasco